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VIA ECF AND EMAIL: bernstein.chambers@nysb.uscourts.gov

Honorable Stuart M. Bernstein
United States Bankruptcy Court
Southern District of New York
One Bowling Green
New York, New York 10004-1408

**Re: *In re: Bernard L. Madoff*, Adv. Pro. No. 08-01789 (SMB); Profit
Withdrawal Proceedings**

Dear Judge Bernstein:

We write on behalf of the claimants represented by Chaitman LLP in the profit-withdrawal proceedings. (“Claimants”). (See ECF No. 14363-1) (listing Claimants).

We understand that the Trustee has recently reached a settlement with Doctors Joel and Norman Blum with respect to the Blums’ objections to the Trustee’s Determination of Claim. (See ECF Nos. 16760, 16761). We write because Claimants and the Blums filed certain motions *in limine* that remain pending before the Court and we simply want to make sure that the Court does not refrain from adjudicating those motions as a result of the settlement with the Blums.

Specifically, on October 28, 2016, the Blums filed a motion to exclude hearsay statements regarding profit withdrawals and to limit the proposed testimony of Lisa M. Collura and Matthew B. Greenblatt (the “Blum Motion”). (See ECF No. 14361). On October 28, 2016, Claimants joined the Blum Motion. (See ECF Nos. 14363, 14594). Claimants also filed their own motion to Strike the Expert Testimony of Lisa M. Collura and Matthew B. Greenblatt, and incorporated the facts and legal arguments set forth by the Blums in support of the Blum Motion (individually, the “Motion to Strike,” collectively, with the Blum Motion, the “Motions”). (See ECF No. 14364).

The Motions have been fully briefed. (See ECF Nos. 14362, 14365, 14485, 14592, 14595). As the Motions remain pending and the Trustee’s settlement with the Blums does not moot the Motions, we respectfully request that the Court proceed to adjudicate these Motions in the ordinary course.

The Court’s attention to these matters is most appreciated.

CHAITMAN LLP

The Honorable Stuart M. Bernstein

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Respectfully submitted,

/s/ Helen Davis Chaitman

Helen Davis Chaitman

HDC/sh

cc: (via ECF and Email)

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